

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Transition from TTY to Real-Time Text Technology	)	CG Docket No. 16-145
	)	
Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology	)	GN Docket No. 15-178
	)	
	)	

**COMMENTS OF CLEARCAPTIONS LLC ON  
TRANSITION FROM TTY TO REAL-TIME TEXT TECHNOLOGY  
FURTHER NOTICE OF PROPOSED RULEMAKING**

ClearCaptions LLC (ClearCaptions) hereby submits its comments in response to the Commission's questions raised in the Further Notice of Proposed Rulemaking, FCC 16-169, released December 16, 2016, in the above-captioned dockets, regarding the "costs, benefits, and technical feasibility of enabling [real-time text (RTT)] for various forms of [Telecommunications Relay Service (TRS)], for both TRS providers and TRS users," and "whether the incorporation of RTT into the provision of TRS operations should be mandated or only allowed."<sup>1</sup>

ClearCaptions commends and strongly supports the Commission's continued drive to improve the TRS experience for consumers, and views the Commission's RTT deployment efforts as a potential means of advancing the mandate of functional equivalence for TRS users.

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<sup>1</sup> *Transition from TTY to Real-Time Text Technology, Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, CG Docket No. 16-145, GN Docket No. 15-178, Report and Order and Further Notice of Proposed Rulemaking, FCC 16-169, ¶¶ 82-83 (Dec. 16, 2016) (*TTY-RTT R&O & FNPRM*).

However, ClearCaptions submits that the Commission should at this time carefully evaluate any technical or practical limitations on the incorporation of RTT into the provision of Internet Protocol Captioned Telephone Service (IP-CTS), and tailor any future rules concerning RTT/IP-CTS integration based on what is technically and practically feasible. In particular, the Commission should – in conjunction with IP-CTS providers – examine whether the provision of RTT on a consumer’s IP-CTS landline phone is technically feasible.

Further, even where the integration of RTT into IP-CTS is technically feasible, the Commission should assess the practical value to consumers of integrating RTT into existing IP-CTS operations. For example, the Commission has asked whether the “use of conversation windows [would] help an IP CTS user distinguish between a direct RTT communication received from the other party and text generated by an IP CTS relay operator.”<sup>2</sup> ClearCaptions is concerned about the degradation of the IP-CTS user experience that might result from a mandate for providers to deliver multiple text boxes, each potentially displaying different text streams (i.e. one text stream from the Communications Assistant and one or more text streams from RTT users). IP-CTS users may find that such an interface is overly confusing, and may be unable to make practical use of multiple simultaneous text streams.

ClearCaptions therefore recommends that the Commission, prior to adopting any rules concerning the incorporation of RTT into TRS operations, conduct a case study in conjunction with consumer groups and IP-CTS providers to assess the technical feasibility and practical usefulness of integrating of RTT into IP-CTS.

Moreover, in any case, incorporation of RTT into IP-CTS should be voluntary for IP-CTS providers, consistent with the Commission’s action of allowing, but not requiring, wireless

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<sup>2</sup> *TTY-RTT R&O & FNPRM* ¶ 86.

providers to support RTT in lieu of TTY technology.<sup>3</sup> As stated by Chairman Pai, the Commission's approach gives wireless providers "the *flexibility* to invest in and deploy RTT."<sup>4</sup> IP-CTS providers should be afforded the same flexibility as to the integration of RTT into IP-CTS.

ClearCaptions is committed to continually improving the IP-CTS user experience, which would include incorporating RTT into its IP-CTS operations if requested or desired by ClearCaptions' IP-CTS users. However, ClearCaptions asks that the Commission carefully evaluate the technical and practical feasibility of incorporating RTT into IP-CTS, and limit the scope of any RTT/IP-CTS integration requirements accordingly. The Commission should also allow IP-CTS providers the flexibility to determine whether and how to integrate RTT into TRS operations in order to best serve TRS users.

Respectfully submitted,

**CLEARCAPTIONS LLC**

Michael Strecker  
Vice President of Regulatory and Strategic  
Policy  
ClearCaptions LLC  
595 Menlo Drive  
Rocklin, CA 95765

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/s/ by Benjamin D. Tarbell\*  
Paul C. Besozzi  
Squire Patton Boggs (US) LLP  
2550 M Street, NW  
Washington, DC 20037  
202-457-7535  
*Counsel to ClearCaptions LLC*

*\*Not admitted in the District of Columbia,  
practice limited to federal communications law.*

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<sup>3</sup> *TTY-RTT R&O & FNPRM* ¶¶ 6, 12.

<sup>4</sup> *TTY-RTT R&O & FNPRM*, Statement of Commissioner Ajit Pai at 81 (emphasis added).